



Michael R. McDonald
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May 11, 2020

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.*,
Case No. 17-1775 (MCA)(JAD)
Telephone Conference on Tuesday May 12, 2020 @ 10:30am**

Dear Judge Dickson:

Gibbons PC, along with Covington & Burling LLP, represents Defendant Samsung Electronics America, Inc. ("Samsung"). In advance of the status conference call scheduled with Your Honor for Tuesday May 12, 2020, at 10:30 a.m., we write on behalf of Samsung and Defendant Sony Electronics Inc. ("Sony") to briefly report on the following relevant items.

In accordance with Standing Order 2020-04 issued by Chief Judge Wolfson, the Defendants' deadline to file a response to the Second Amended Complaint is June 8, 2020. Prior to that date, the Defendants will be filing the following separate motions:

1. Samsung will file a motion to compel arbitration of the claims asserted by Plaintiffs White and Cauley, and for other related relief.
2. Sony will file a motion (1) to compel arbitration of the claim asserted by Plaintiff White and/or dismissal of such claim for lack of subject-matter jurisdiction and (2) to strike class claims and deny class certification
3. Sony will file a motion to sever the claim against it from the claim against Samsung.

We look forward to discussing the case with Your Honor tomorrow.

Respectfully submitted,

s/ Michael R. McDonald
Michael R. McDonald

cc: All Counsel of Record (via ECF)